

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

v.

GORDON J. COBURN and
STEVEN E. SCHWARTZ,

Defendants.

Hon. Michael Farbiarz

Crim. No. 19-120 (MEF)

**NOTICE OF DEFENDANTS' MOTION
CONCERNING THE CONSTRUCTIVE DENIAL OF THEIR
MOTION FOR OVERSEAS DEPOSITIONS**

PLEASE TAKE NOTICE that Defendants Gordon J. Coburn and Steven Schwartz hereby move before the Honorable Michael Farbiarz, United States District Judge for the District of New Jersey, for entry of an Order granting Defendants' Motion Concerning the Constructive Denial of Their Motion for Overseas Depositions and the relief requested therein.

PLEASE TAKE FURTHER NOTICE that in support, Defendants shall rely on the accompanying Brief in Support of Defendants' Motion Concerning the Constructive Denial of Their Motion for Overseas Depositions and the Declaration of James P. Loonam with an accompanying exhibit, filed herewith.

PLEASE TAKE FURTHER NOTICE that a proposed Order and a certificate attesting to the date and manner of service are submitted herewith.

Dated: July 15, 2024

Respectfully submitted,

/s/ James P. Loonam

James P. Loonam

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